

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH CAROLINA
CASE NO. 5:20-CV -230**

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CAMERON CAIN BAARBÉ, *et al.*,

Plaintiffs,

-against-

THE SYRIAN ARAB REPUBLIC,

Defendant.

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EXPERT DECLARATION OF DR. ALAN FRIEDMAN

ALAN FRIEDMAN, M.D., pursuant to 28 U.S.C. § 1746, subject to the penalties for perjury of the United States of America, declares as follows

1. I am a Medical Doctor with extensive experience treating victims of violent trauma, and administering pain management therapy in a variety of hospital and clinical settings in the United States and Israel. I specialize in Physical Medicine and Rehabilitation, and nerve injuries.
2. I received my M.D. from the Albert Einstein College of Medicine, Bronx, New York in 1993, I am board certified, *inter alia*, by the American Board of Physical Medicine and Rehabilitation (2000 and 2010), was certified by the American Board of Internal Medicine (1996). I am also certified as a specialist in Rehabilitation Medicine in Israel. In addition, I am licensed to practice medicine by the States of New York, New Jersey, and Ohio, as well as Israel. I am a member of the American Academy of Physical Medicine and Rehabilitation, the American College of Sports Medicine, the American Academy of Pain Management, the Israeli Society of Rehabilitation and Physical Medicine, and the Israeli Society of Musculoskeletal Medicine.

3. From July 1993 through June 1996, I did a residency in Internal Medicine at North Shore University Hospital, Cornell Medical School, in Manhasset, New York. Thereafter, from July 1996 through June 1999, I did my residency in Physical Medicine and Rehabilitation at the Kessler Institute for Rehabilitation, UMDNJ/New Jersey Medical School, in Newark, New Jersey.

4. My residency training in Rehabilitation Medicine involved substantial evaluation and treatment of trauma victims, including gunshot and shrapnel wounds, Traumatic Brain Injury, Spinal Cord Injury, peripheral nerve injuries, and pain management and other therapies associated therewith.

5. Currently, I divide my time between private practice in New York and New Jersey, and being Chief of Physical & Musculoskeletal Medicine at Soroka University Medical Center in Be'er Sheva, Israel and have been Chief since October 2016. From July 2009 until October 2016, I was the Department Head of Rehabilitation Medicine at Laniado Hospital, Tzanz Medical Center, in Netanya, Israel. Prior to joining Laniado Hospital, I worked as a Staff Physiatrist at Hadassah University Hospital in Jerusalem, Israel from May 2001 to January 2009. I also served as a Medical Consultant for the Appeals Court for Disability Claims at the District Court in Jerusalem, Israel from January 2005 to December 2010. At both my private practice and my work at Soroka University Medical Center, I have focused on the evaluation and treatment of numerous types of nerve injuries. Due to the prevalence of terrorism in Israel, during my years of practice in Israel I have evaluated and treated hundreds of trauma victims, many of whom suffered gunshot and/or shrapnel wounds.

6. Over the course of my career, including my residency and my current work, I have evaluated and treated hundreds of trauma victims, including both blunt and penetrating trauma. Penetrating trauma is anything that entails a significant penetration or laceration of the body.

Examples include gunshot wounds, stabbings, and blast wounds among others. Blunt trauma usually results from a fall or having been struck with a blunt object (such as a pipe), but is no less serious. Either of these may result in anything from a slight or superficial wound to death. The spectrum entails Traumatic Brain injury (TBI) or Spinal Cord injury (SCI), and multiple fractures, and each of these may, accordingly, affect the patient's functional status in myriad ways. Much of the training in Physical Medicine and Rehabilitation focuses on these injuries and their resultant outcomes. As such, much of my time is and has been spent diagnosing and treating these types of injuries. Many of the consultations and electrodiagnostic tests that I perform on a daily basis involve patients with trauma. The evaluation and treatment consist of directed exercise regimens, physical therapy, splints, assistive devices for ambulation or daily tasks, and medications.

7. Based on my education and experience as outlined above, I have been qualified and testified as an expert witness in numerous cases in the United States, including *Wultz v. Islamic Republic of Iran*, Civil Action 08-cv-1460 (RCL) (D.D.C.), *Sapirstein v. Palestinian Authority*, Case No. 0420225-CIV-Turnoff (S.D.FL.), *Ungar v. Palestinian Authority*, CV No. 00-105L (D.R.I.), *Stern v. Islamic Republic of Iran*, Case No. 1:00-CV-2602 (RCL) (S.D.N.Y.) and *Rubin v. Islamic Republic of Iran*, 01-1655 (D.D.C.).

8. I also submitted expert testimony by affidavit in *Borochov v. Islamic Republic of Iran*, 589 F. Supp. 3d 15 (D.D.C. 2022); *Braun v. Islamic Republic of Iran*, 228 F. Supp. 3d 64 (D.D.C. 2017); *Kaplan v. Hezbollah*, 213 F. Supp. 3d 27 (D.D.C. 2016); *Leibovitch v. The Syrian Arab Republic et al.*, 08 CV 01939 (WTH) (NDI), *Ben Haim v. Islamic Republic of Iran*, C.A. No. 00 CV 02602 (RCL); *Stern v. Islamic Republic of Iran*, 271 F. Supp. 2d 286 (D.D.C. 2003); and *Knox v. The Palestine Liberation Organization*, C.A. No. 03 CV 4466 (VM) (THK), which was tried in the Southern District of New York.

9. A copy of my curriculum vitae, including a list of all publications authored by me within the preceding ten years, is attached hereto as Exhibit A. I have been retained by Plaintiffs in above-captioned matter to provide expert opinions regarding the physical injuries suffered by Plaintiffs Eytan Rund, Nitzhia Goldman and Ron and Pnina Greenfield.

10. I have no personal or professional relationship with any party in this case that would prevent me from providing impartial testimony in this matter. I am being compensated \$2,500 per Plaintiff for my evaluation and preparing my report and this declaration.

11. I have prepared reports regarding my evaluation of each of the plaintiffs, each of which is true to the best of my own knowledge and belief. Those reports are attached hereto as follows:

Exhibit B - Plaintiff Eytan Rund

Exhibit C - Plaintiff Ron Greenfield

Exhibit D - Plaintiff Pnina Greenfield

Exhibit E - Plaintiff Nitzhia Goldman

12. Regarding the estate plaintiffs, I have prepared reports, which are true to the best of my own knowledge and belief, regarding my review of the death certificate and Medical Examiner's report for each, as follows:

Exhibit F - Decedent Nohemi Gonzalez

Exhibit G - Decedent Alexander Pinczowski

13. I declare under the penalties for perjury of the United States of America that the foregoing statements, and the statements contained in my CV and my reports are true and correct.

Dated: March 27, 2023



Alan Friedman, MD

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed this the 28th day of March 2023 with the Clerk of Court using the CM/ECF system. Parties may access this filing through the Court's Electronic Filing System.

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